

EXHIBIT “B”

From: Angeli Murthy x7425
Sent: Friday, August 31, 2018 4:58 PM
To: 'lhannah969'
Cc: Jacqueline Kerr x7417
Subject: RE: *EXT* Re: 7727245 Jimenez, Ramon vs. Best Behavioral Healthcare:

Thanks very much for the quick response – I wish all my clients were that responsive! Let me know if you have a counter, or anticipate having one.

Thanks, again, and I hope you enjoy the holiday weekend.

From: lhannah969 [mailto:lhannah969@aol.com]
Sent: Friday, August 31, 2018 4:42 PM
To: Angeli Murthy x7425
Subject: RE: *EXT* Re: 7727245 Jimenez, Ramon vs. Best Behavioral Healthcare:

Your offer is rejected,

Sent from my Sprint Samsung Galaxy S7.

----- Original message -----

From: AMurthy@forthepeople.com
Date: 8/31/18 4:40 PM (GMT-05:00)
To: 'lhannah969' <lhannah969@aol.com>
Cc: Jacqueline Kerr <JKerr@ForThePeople.com>
Subject: RE: *EXT* Re: 7727245 Jimenez, Ramon vs. Best Behavioral Healthcare:

CONFIDENTIAL SETTLEMENT COMMUNICATION

Good afternoon Mr. Hannah,

I have spoken with my client. Our attorneys' fees are in excess of \$30,000 at this time, including \$3,000 in actual hard-costs. While I understand that your email below was more of a feeler, and not an offer per se, I have been authorized to present the following demand in response:

My client will accept \$6,000 in satisfaction of his claims for wages, and will execute a mutual general release.

We will agree to a compromise of attorneys' fees at \$25,000.00. For a total demand of \$31,000.00.

If your client would prefer, we are amenable to resolving the wage/mutual release issue at \$6,000 (or another number mutually agreeable to our clients), and then submitting a petition for fees separately to the Court for a determination of same.

This offer will expire at COB Tuesday, as once I fly to Philadelphia for the remaining depositions, our fees will increase significantly, and we will not be able to offer to resolve same for at or less than \$30,000.00. Even though I will do significant work preparing for these depositions over the weekend, I am not including that time in the current demand, as I believe that both of our clients would be well-served to resolve their differences without further litigation.

I have not been advised that this is a bottom line, so if you have a counter, please feel free to let me know, and I will discuss with my client. I will be working intermittently throughout the weekend, and should be able to get you a response to any counter quickly.

Thanks very much.

Angeli Murthy

Attorney

[My Bio](#)

P: 9543275369

F: 9543273016

A: 600 N Pine Island Rd, Suite 400, Plantation, FL 33324

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A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: lhannah969 [<mailto:lhannah969@aol.com>]

Sent: Thursday, August 30, 2018 4:43 PM

To: Angeli Murthy x7425

Subject: *EXT* Re: 7727245 Jimenez, Ramon vs. Best Behavioral Healthcare:

In reviewing your motion you have indicated your client's unpaid wages are \$8,170.75. In light of this information i am willing to have my clients offer \$4000.00 to settle this matter. Please note I do not have such

authority however in light of additional attorney's fees my clients will pay i can recommend this amount if you make such demand and can convince them to accept the same. Please get back with me.

Thank you,

LEWIS HANNAH

Sent from my Sprint Samsung Galaxy S7.

----- Original message -----

From: AMurthy@forthepeople.com

Date: 8/30/18 2:15 PM (GMT-05:00)

To: "'lhannah969@aol.com'" <lhannah969@aol.com>

Cc: lawofficeoflewisphannah@gmail.com, Jacqueline Kerr <JKerr@ForThePeople.com>

Subject: 7727245 Jimenez, Ramon vs. Best Behavioral Healthcare:

Good afternoon Mr. Hannah,

I got your voicemail, but unfortunately have been in depositions (Detroit) and mediations (Orlando), and traveling throughout the day for the entire week and have not had the opportunity to return your call at a decent hour. I am currently in a mediation in Orlando, and don't expect to end until 6:00 or so. I have a flight back to Miami at 7:30, and, as you know have flight out again tomorrow morning at 10 after our call with the Court. I am happy to call you at 6:00 (or earlier if my mediation ends earlier), if that is convenient, if you let me know at what number to reach you and until what time I can call. It may be easier for today to communicate by email.

I had also wanted to discuss production of the receipts, which are still outstanding, or whether Defendant will stipulate to enterprise coverage so that that production is not necessary. I'd like to avoid the motion practice if possible, so please do let me know.

Thanks very much.

Angeli Murthy

Attorney

[My Bio](#)

P: 9543275369

F: 9543273016

A: 600 N Pine Island Rd, Suite 400, Plantation, FL 33324

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